

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE:)	CHAPTER 7
)	
Anthony J. Cilwa,)	Case No. 15-00263-hb
)	
Debtor,)	
_____)	

**MOTION FOR EXAMINATION OF DEBTOR
PURSUANT TO RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE**

John K. Fort, Trustee, by and through his undersigned counsel, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, and hereby moves this Court to enter an order allowing him to examine the Debtor, Anthony J. Cilwa, on the 16th day of June, 2015, beginning at 10:00 a.m., at the offices of Roe Cassidy Coates & Price, PA, 1052 North Church Street, Greenville, South Carolina, 29601. In support of this Motion, the Trustee respectfully shows the Court as follows:

1. Trustee seeks that it, by and through counsel, be allowed to examine the Debtor as to the Debtor's acts, conduct, property, liabilities, assets, financial condition, and any other matters that may affect the administration of the Debtor's estate and is permissible under Rule 2004 of the Federal Rules of Bankruptcy Procedure.

2. Upon information and belief, certain real property is owned by a self-settled revocable trust of the Debtor. The Debtor caused the trust to grant him and his wife a life estate in the property and the Debtor and his wife took out a substantial reverse mortgage on the property. The proceeds of the reverse mortgage, the life estate, the interest in the trust, and the real property were not listed on the Debtor's initial schedules.

WHEREFORE, the Trustee prays that this Court enter an Order allowing him to examine the Debtor, Anthony J. Cilwa, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, as detailed herein.

Dated this 21st day of May, 2015.

/s/ James H. Cassidy
James H. Cassidy (Fed. Bar No. 73)
jcassidy@roecassidy.com
Joshua J. Hudson (Fed. Bar No. 11620)
jhudson@roecassidy.com
ROE CASSIDY COATES & PRICE, P.A.
1052 North Church Street
Greenville, SC 29601
Phone – (864) 349-2600
Fax – (864) 349-0303
Attorneys for Trustee

Greenville, South Carolina